

# Ecology Review Comments

## East Waterway Operable Unit Proposed Plan

### (Draft Final, February 23, 2021)

<i>Comment No.</i>	<i>Section</i>	<i>Paragraph<sup>a</sup></i>	<i>Page#</i>	<i>Comment</i>
1	1	Text box	2	Change the 4th item to “Scope of the Remedial Strategy for the EW Operable Unit” to make it consistent with the heading of Section 4 on Page 20.
2	1.1	3	3	The steps of the process that have been completed at the Site should include the actions completed prior to the 2014 SRI, including the non-critical removal actions conducted in 2004-2005.
3	2.1	5	7	Please provide the project webpage address for the Site.
4	3.1	1 <sup>st</sup> Bullet	9	Please clarify whether the Deep Main Body and Berth Areas include the entire Deep Main Body as well as the entire Junction Reach, or just the northern end of the Deep Main Body Reach and the southern-end of Junction Reach.
5	3.1	Fig 6	11	As shown on Fig 6, the Junction Reach is included in the category of “Deep Main Body and Berth Areas”. Thus, it should be added in the open water areas in the note beneath Fig 6.
6	3.2.1	1	12	Suggest describing description of sources of contamination with the same terms as used in the callout on pg 14. E.g., “Ongoing sources include contaminated upland sites, spills and leaks, bank erosion, deterioration of treated-wood structures, and urban pollution that enters the EW OU directly through stormwater runoff and CSOs (together termed lateral loads), and indirectly from the upstream Green River watershed (See Figure 7). “
7	3.2.1	2	12	Suggested edit: EPA is working with the EWG to develop source control plans that address <b>current</b> chemical sources directly discharging to the EW OU, as described on page <b>Error! Bookmark not defined..</b>
8	3.2.1	3	12	Have source tracing and cleanup programs reduced the frequency and volumes of discharges? I would remove source tracing and cleanup programs if the point is about frequency and volume. Suggest editing to: “The County and the City have reduced the frequency and volumes of discharges to the EW OU. Both also conduct source tracing and cleanup actions at upland facilities and properties. These actions include cleaning.....”
9	3.2.1	4	12	Suggest revise the second sentence as follows “EPA and EWG will perform Source Control an assessment during remedial design to ensure that the major sources are sufficiently managed to minimize the risk of recontamination.”

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				Please define the term "recontamination"
10	3.2.1	Text box, after section	14	1 <sup>st</sup> Paragraph. Please define the term recontamination.
11	3.2.2	Text box, after section	14	<p>2nd paragraph,</p> <p>Not sure why Ecology was removed here since Ecology leads LDW source control.</p> <p>It would be better phrased and accurate to state the following: EPA is working with King County, the City of Seattle and the Port of Seattle implement source control plans employing source control actions similar to those for Lower Duwamish Waterway and per federal Clean Water Act and Washington State Water Pollution Control Act requirements. In addition, CSO controls are required under both State federal Consent Decrees.</p> <p>Upstream Sources: the following text is recommended: Sources in the LDW include heavy industrial activities, storm water, CSOs, ground water discharge, bank erosion, and treated wood structures. EPA is working with King County, the City of Seattle, as well as smaller municipalities in the watershed...</p>
12	3.2.3	3	15	The text and Figure 8 presented the horizontal distribution of the major risk drivers in surface sediment. However, there is lack of information regarding vertical distribution of the major COCs. Suggest adding cross-sections figures or text to present the vertical extent of the two major COCs (PCBs and mercury) in subsurface sediment.
13	3.2.3	6	17	Is additional assessment still needed now that USCG collected additional sediment samples? What is the results of the assessment?
14	3.2.3	Text box	15	Change "Toxic equivalencies" to "toxic equivalency quotient"
15	3.2.3	Last para	17	The text states that EPA is currently coordinating with the USCG to evaluate options and perform a cleanup of sediments at Slip 36. However, it's not clear whether the cleanup of sediments at Slip 36 will be conducted by the USCG as a separate remedial action.
16	3.2.4	1	17	Include a statement about why AB values were calculated? i.e. what they would be used for. Also provide the rule reference that allows ABs to be considered in cleanups.
17	3.2.4	3	17	Please add Anchor QEA 2021; Table 3 to the reference list.

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18	3.2.4	Table 3	18	<p>Add a reference or briefly discuss how the Dioxin/Furan TEQ was established since it is not included in the AB memo.</p> <p>Foot note to table 3. The table only presents the AB values. Please add column for RBTC and Rals so a reader can make a comparison.</p>
19	3.2.4	-	-	<p>General comment: Please add a paragraph about reevaluating the AB value in the future. Will EPA revisit this after a set time has passed? If source control efforts within the watershed are successful the AB values should decrease over time. Is EPA then going to lower the cleanup level to a more protective value?</p>
20	3.3	2	18	<p>Section 9 on Page 49 regarding placement of Residuals Management Cover, it says that for the preferred alternative, 4 to 12 inches thick of RMC will be placed following completion of dredging activities. If the deepening project is implemented following completion of the cleanup, it is most likely that the clean RMC materials need to be removed. This will be an interference with the cleanup action, correct?</p>
21	3.3	2	18	<p>How could a deepening project not impact the cleanup? Was the cleanup designed to accommodate the deepening project? If so, explain how. If there is no impact from the deepening project, please explain why not.</p>
22	3.3	3	18	<p>DNR does not own most of the aquatic bottom lands in the EW OU. The land is owned by the State and managed by DNR.</p>
23	3.4	1	18	<p>Commercial activities are not discussed in Section 3.3 and are not shown in Figure 9.</p>
24	3.4	1	18	<p>Last sentence in paragraph 1. Please explain what the fish advisories are based on.</p>
24	4	5	21	<p>3<sup>rd</sup> bullet point add: Direct contact with surface waters <b>and sediments</b> for swimmers, including skin absorption and incidental</p> <p>4<sup>th</sup> bullet edits: Direct contact with sediment for habitat restoration workers, including incidental ingestion and dermal contact.</p>
26	6.2.2	1	27	<p>Please provide the points of compliance for the PRGs as listed in Table 6.</p>
27	6.2.2	2	27	<p>The CERCLA program does not generally set cleanup levels below natural or anthropogenic background concentrations with consideration of cost effectiveness, technical practicability, and the potential of recontamination from adjacent areas with elevated background concentrations. However, it should be noted that the cleanup levels established under SMS only consider technical possibility and net adverse environmental impact, not cost.</p>

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28	6.2.2	4	27	The PRGs for PCBs, D/Fs, arsenic have been established based on their anthropogenic background as proposed in the AB Technical Memorandum (QEA, March 2021). As Ecology commented on the AB technical memorandum, the concept of anthropogenic background under CERCLA is different from the concept of regional background under SMS. Additional discussion is needed to demonstrate how meeting the proposed anthropogenic background will meet SMS requirements for regional background.
29	7.1	3	30	It says that the RALs for each of the COCs were based on the lowest established PRGs with the exception of PCBs. This statement is not correct for dioxins/furans. The PRGs for dioxins were established for four congeners, however, the RAL has been established for dioxins/furans TEQ.
30	7.2.1	3rd bullet	31	It says that all sediment with contaminant concentrations above the RAL is removed in most open water areas. Please clarify if there are any other areas other than the Communication Cable Crossing area where contaminated sediment above the RAL will remain.
31	7.4	General		It appears that no action will be implemented in the riprap areas as shown in Fig 11 through Fig 13. Please provide a brief discussion in the text why no remedial actions have been proposed in those areas and how this no action will impact the overall effectiveness of the cleanup in the long-term.
32	9	Last bullet	47	Suggest adding "but above PRGs" at the end of the last sentence.
33	9.1	Figs 14 and 15	49	The Last bullet on Page 47 says that MNR will be implemented in 36 acres of the waterway, but this has not been presented in neither Fig 14 nor 15. The legend needs to be updated.

<sup>a</sup> Paragraph refers to the paragraph within the designated section.